

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF SOUTH CAROLINA  
3 COLUMBIA DIVISION

4 LAKEYSHA TENILLE HENRY, as an  
5 individual,

6 Plaintiff(s),

7 vs.

8 SCREENING REPORTS, INC., a Foreign  
9 Corporation registered to do business in the  
10 State of Florida; and DOES 1-10 inclusive,

11 Defendant(s).  
12  
13  
14  
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Case No.: 3:23-3408-MGL

COMPLAINT FOR DAMAGES and  
DEMAND FOR JURY TRIAL

16  
17 Plaintiff LAKEYSHA TENILLE HENRY (hereafter “Plaintiff”) files her  
18 Complaint for Damages and Demand for a Jury Trial against Defendants SCREENING  
19 REPORTS, INC., and DOES 1-10 inclusive (hereinafter collectively as “Defendants”), and  
20 alleges as follows:

21 NATURE OF THE ACTION

22 1. Defendant is a tenant screening company that furnishes tenant screening  
23 reports to prospective landlords. Its reports include information related to an applicant’s  
24 credit history, eviction history and criminal history.

25 2. On or about July 2021, Plaintiff submitted an application with the landlord  
26 The Vue at St. Andrews.

27 3. In connection with Plaintiff’s housing application, The Vue procured a  
28 background screening report on Plaintiff from Defendant.



1           15.     Screening Reports is a foreign company registered to do business in Florida  
2 with the Florida Secretary of State. Defendant is subject to the jurisdiction of this Court and  
3 may be served with process by serving its registered agent, Corporation Service Company.

4           16.     Plaintiff is ignorant of the Defendants sued herein as DOES 1-10, inclusive,  
5 and therefore sues those Defendants by such capacities when such information is  
6 ascertained through discovery.

7           17.     Plaintiff is informed and believes and thereon alleges that each of the DOES  
8 1-10 Defendants is responsible in some manner for the occurrences herein alleged and that  
9 Plaintiff's damages as herein alleged were proximately caused by such occurrences.

10          18.     Plaintiff is informed and believes and thereon alleges that, at all times herein  
11 mentioned, Defendants DOES 1-10, were principals or agents of each other and of the  
12 named Defendants and in doing the things alleged in this complaint, were acting in the scope  
13 of such agency and with the permission and consent of Defendants.

14                                   **FIRST CAUSE OF ACTION**  
15                                   **(15 USC §1681(e)(b) and DOES 1-10)**

16          19.     Plaintiff hereby incorporates by reference the allegations of each and every  
17 paragraph above.

18          20.     Defendant willfully and/or recklessly violated the above-referenced sections  
19 of the FCRA by disclosing erroneous information.

20          21.     Defendant's conduct was willful and/or reckless because it knew that  
21 disclosing pardoned records is insufficient to assure maximum possible accuracy of the  
22 criminal history information reported.

23          22.     Plaintiff is informed, and believes, and thereon alleges that Defendant failed  
24 to sufficiently conduct audits, reviews, or quality control of the information it reported.

25          23.     Alternatively, Plaintiff alleges that Defendant's violations were negligent.

26                                   **PRAYER FOR RELIEF**

27                   WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as  
28

1 follows:

- 2 a. For a declaration that Defendants' practices violate FCRA  
3 b. For statutory, compensatory, special, general, and punitive damages according  
4 to proof and as applicable against all Defendants;  
5 c. For interest upon such damages as permitted by law;  
6 d. For an award of reasonable attorneys' fees provided by law under all  
7 applicable statutes;  
8 e. For the costs of the lawsuit;  
9 f. For injunctive relief as applicable; and  
10 g. For such other orders of the Court and further relief as the Court deems just  
11 and proper.

12 Dated: July 17, 2023

/s/ Penny Hays Cauley

Penny Hays Cauley, Fed. ID No. 10323

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*\*Pro Hac Vice Forthcoming*

Attorneys for Plaintiff

**DEMAND FOR JURY TRIAL**

Plaintiff hereby requests and demands a jury trial on all issues triable by jury.

/s/ Penny Hays Cauley

Of Counsel